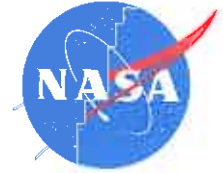


National Aeronautics and Space Administration  
**Goddard Space Flight Center**  
Greenbelt, MD 20771



January 17, 2013

Reply to Attn of: 140

TO: Distribution

FROM: 140/Chief Counsel

SUBJECT: Widely Attended Gathering Determination Regarding Attendance at  
TDRS-K Launch Reception

The United Launch Alliance (ULA) is sponsoring a pre-launch reception for the TDRS-K launch. The reception is scheduled for Monday, January 28, 2013, with the launch scheduled for Tuesday, January 29, 2013. The reception will be held at the Doubletree Hotel in Cocoa Beach, FL. Approximately 1000 individuals have been invited, including representatives from industry, academia, Congress, and Federal agencies. The cost per person of the reception is \$25.

Based on the above, I find that the event meets the requirements of a "widely attended gathering" as defined in 5 CFR 2635.204(g). I further find that there is an Agency interest in having NASA employees attend this event because attendance at the receptions will allow NASA employees an opportunity to discuss NASA missions and programs with the other guests. Accordingly, NASA employees whose duties do not substantially affect the event sponsor may accept an invitation for free attendance to the reception for themselves and their spouses or guests.

NASA employees whose duties substantially affect the event sponsors, for instance by way of procurement duties, should seek an individual determination regarding participation in this event from their local ethics counselor. Moreover, NASA employees who are in non-career positions in which the President's Executive Order of January 21, 2009 requires signing an ethics pledge may only attend if they reimburse the sponsor the cost of the refreshments they consume at the reception.

  
R. Andrew Falcon